

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

PLYMOUTH COUNTY RETIREMENT)
ASSOCIATION, on Behalf of Itself and All)
Others Similarly Situated,)

Plaintiffs,)

vs.)

PRIMO WATER CORPORATION, BILLY D.)
PRIM, MARK CASTANEDA, DAVID J.)
MILLS, RICHARD A. BRENNER, DAVID)
W. DUPREE, MALCOLM McQUILKIN,)
DAVID L. WARNOCK, JACK C. KILGORE,)
CULLIGAN INTERNATIONAL COMPANY,)
ANDREW J. FILIPOWSKI, CARL V.)
SANTOITEMMO, STIFEL, NICOLAUS &)
COMPANY, INC., BB&T CAPITAL)
MARKETS, JANNEY MONTGOMERY)
SCOTT LLC, and SIGNAL HILL CAPITAL)
GROUP LLC,)

Defendants.)

1:11-cv-01068-TDS-PTS

**LEAD PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
AMENDED COMPLAINT AND DEFENDANTS’ RESPONSES THERETO**

Plaintiff Employees’ Retirement System of the Government of the Virgin Islands (“VI Retirement System” or “Lead Plaintiff”) respectfully submits this Unopposed Motion for Extension of Time to File Amended Complaint and Defendants’ Responses Thereto. In support, Lead Plaintiff states:

1. On December 2, 2011, plaintiff Plymouth County Retirement Association (“Plymouth County”), on behalf of itself and all others similarly situated, filed a purported Class Action Complaint for Violations of Federal Securities Laws (the “Complaint”).

2. The Complaint is brought on behalf of a putative class of all persons or entities who acquired Primo Water Corporation (“Primo” or the “Company”) common stock pursuant or traceable to the Company’s initial public offering on or about November 4, 2010, and the Company’s offering of common stock on or about June 17, 2011, as well as purchasers of Primo common stock between November 4, 2010 and August 10, 2011 against defendants Primo, Billy D. Prim, Mark Castaneda, David J. Mills, Richard A. Brenner, David W. Dupree, Malcolm McQuilkin, David L. Warnock, Jack C. Kilgore, Culligan International Company, Andrew J. Filipowski, Carl V. Santoiemmo, Stifel, Nicolaus & Company, Inc., BB&T Capital Markets, Janney Montgomery Scott LLC, and Signal Hill Capital Group LLC (collectively, “Defendants”). The Complaint alleges claims for violations of Sections 11, 12(a)(2), and 15 of the Securities Act of 1933 and Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995, and Rule 10b-5 promulgated thereunder.

3. On March 7, 2012, Plymouth County and Defendants collectively filed a Joint Motion to Establish Deadlines for Filing Amended Complaint and Defendants’ Responses Thereto [Dkt. No. 42], which the Court granted on April 13, 2012 (the “Order Establishing Deadlines”). [Dkt. No. 50].

4. On April 13, 2012, the Court appointed VI Retirement System as Lead Plaintiff. [Dkt. No. 49].

5. Lead Plaintiff’s Amended Complaint is currently due to be filed on June 12, 2012, Defendants’ response thereto is due be filed on August 13, 2012, Lead Plaintiff’s opposition to

Defendants' response is due to be filed on October 12, 2012, and Defendants' reply to Lead Plaintiff's opposition is due to be filed on December 11, 2012.

6. Due to a very serious and ongoing family medical issue that has recently come up involving Lead Plaintiff's counsel, Mr. David J. George, Esq., Lead Plaintiff has requested, and Defendants have agreed to, extend the deadlines established in the Order Establishing Deadlines by ten days, giving: Lead Plaintiff up to and including June 22, 2012 to file the Amended Complaint; Defendants up to and including August 23, 2012 to file their response thereto; Lead Plaintiff up to and including October 22, 2012 to file its opposition to Defendants' response; and Defendants up to and including December 21, 2012 to file their reply to Lead Plaintiff's opposition.

7. In accordance with the LR 6.1, counsel for Lead Plaintiff has consulted with counsel for Defendants, and Defendants do not oppose the filing of the motion.

WHEREFORE, Lead Plaintiff respectfully requests that the Court enter an Order granting Lead Plaintiff an extension of time up to and including June 22, 2012 and October 22, 2012, respectively, to file the Amended Complaint and Lead Plaintiff's opposition to Defendants' response thereto, and granting Defendants an extension up to and including August 23, 2012 and December 21, 2012, respectively, to file their response to the Amended Complaint and Defendants' reply to Lead Plaintiff's opposition and such other and further relief as the Court deems just and proper.

DATED: June 8, 2012

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KATHLEEN L. BARBER

/s/ Robert J. Robbins

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Attorneys for Lead Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 8, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this notice as service of this document by electronic means.

/s/ Robert J. Robbins

Robert J. Robbins